

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

REPUBLICAN NATIONAL
COMMITTEE,

Plaintiff,

v.

No. 3:22-cv-00037-RAM-RM

JOHN CANEGATA; ROBERT MAX
SCHANFARBER; and VIGOP (VIRGIN IS-
LANDS REPUBLICAN PARTY), also known
as VIGOP PAC,

Defendants.

JOINT MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY

Plaintiff Republican National Committee and Defendants John Canegata, Robert Max Schanfarber, and VIGOP (Virgin Islands Republican Party) jointly move for an extension of time to complete discovery. In support of this motion, the parties state as follows:

1. On September 16, 2022, this Court entered a trial management order with the following relevant deadlines:

- May 12, 2023: Close of fact discovery
- June 9, 2023: RNC's expert materials
- August 11, 2023: Defendants' expert materials
- October 13, 2023: Dispositive motions

2. The RNC noticed depositions for Schanfarber, Canegata, and VIGOP PAC for May 10, May 11, and May 12, respectively. *See* Doc. 92. However, a modest extension is required to accommodate Defendants' schedule.

3. The parties also have been receiving responses and productions from the third-party recipients, which the RNC has shared with Defendants. At least one subpoena recipient requests

additional time to comply with the subpoena and produce the responsive documents without unduly expediting the review by May 12 and incurring substantial costs. Moreover, the parties need additional time to review these documents and conduct any necessary follow-ups with the subpoena recipients.

4. The parties request this Court's leave to complete discovery under the following revised schedule:

- June 30, 2023: Close of fact discovery
- July 28, 2023: RNC's expert materials
- August 31, 2023: Defendants' expert materials

5. This modest extension of discovery deadlines will not unduly prejudice any party because both parties consent to such relief and jointly file this motion. Critically, this extension will not delay any further proceedings before this Court. Under the trial management order, dispositive motions are not due until October 13, 2023. The parties will still have ample time to prepare those motions even with the modest extension of the discovery deadlines.

6. In addition, to the extent that the Court extends the existing discovery deadlines, the parties similarly request that it reschedule the May 18 status conference to the week of July 3 or the week of July 10 (excluding July 11).

* * *

For the foregoing reasons, and other good cause found, the parties jointly request that the Court extend the discovery deadlines. And the parties respectfully request that the Court reschedule the May 18 status conference to the week of July 3 or the week of July 10.

Dated: May 9, 2023

/s/ Kevin F. D'Amour

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Respectfully submitted,

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